

EPA Jacket 83454-22

Vol.2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 27, 2017

Ross Beattie
Regulatory Manager
BWA Water Additives US LLC
1979 Lakeside Parkway, Suite 925
Tucker, GA 30084

Subject: Label Amendment – Amendment of dose rates
Product Name: Bellacide 301
EPA Registration Number: 83451-22
Application Date: December 5, 2016
Decision Number: 524268

Dear Mr. Beattie:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

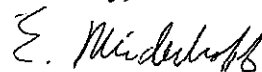
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

Page 2 of 2
EPA Reg. No. 83451-22
Decision No. 524268

If you have any questions, please contact Tara Flint at flint.tara@epa.gov or Eric Miederhoff at Miederhoff.eric@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Miederhoff".

Eric Miederhoff
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

{All text in brackets [xxx] is optional and may or may not be included on a final label.}
{All text in braces {xxx} is administrative and will not appear on a final label.}

BELLACIDE 301

For use as an algicide, bactericide, fungicide, for the control of algae, slime forming bacteria, sulfate reducing bacteria, and fungi in air-washers and industrial air scrubbing systems, recirculating cooling water and process water systems including cooling towers, evaporative coolers, brewery pasteurizers, can warmers, and hydrostatic sterilizers and retorts, non-food contact paper and paperboard process water (e.g.: brown paper, corrugated sheet, Kraft paper, newsprint, etc.), and enhanced oil recovery systems, oil and gas production and transmission pipelines and systems, gas storage wells and systems, hydrotesting of pipelines and tanks, pipeline pigging and scraping operations and oil and gas well drilling and maintenance fluids. FOR INDUSTRIAL APPLICATION using closed metered delivery systems ONLY. Open pouring is prohibited.

ACTIVE INGREDIENT:

Tributyl Tetradecyl Phosphonium Chloride	2.78%
Poly[oxyethylene(dimethyliminio)ethylene (dimethyliminio)ethylene dichloride]	2.22 %
OTHER INGREDIENTS:	95.00 %
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN
DANGER

ACCEPTED

01/27/2017

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 83451-22

FIRST AID:

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [IN CASE OF EMERGENCY, CALL 1-800-424-9300 (CHEMTREC)] [telephone number supplied by supplemental registrant].]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER. Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through the skin. Do not get in eyes or clothing. Avoid breathing spray mist. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco. Remove and wash contaminated clothing before reuse. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, socks, shoes and gloves. Prolonged or frequent repeated skin contact may cause allergic reaction in some individuals.

PHYSICAL OR CHEMICAL HAZARDS: Do not mix with other chemicals. Mix only with water.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in any manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

This product must be loaded and transferred only using a metering-pump system or a close loading/application system. Open pouring is prohibited.

Be sure to release any pressure in the container prior to fully opening. This can be done by loosening the closure prior to fully opening the container. **DO NOT OPEN WITH FACE CLOSE TO THE CONTAINER OPENING.**

[RECIRCULATING COOLING AND PROCESS WATER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in commercial and industrial cooling towers, evaporative condensers, evaporative coolers, closed loop heating and cooling systems and industrial process water systems. Add this product at a point of uniform mixing such as the basin area.

DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add 34.6 to 103.7 fluid ounces of product per 1000 gallons (270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 10.3 to 51.8 fluid ounces of product per 1000 gallons (81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[AIR WASHERS AND INDUSTRIAL AIR SCRUBBING SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in air washing systems equipped with a mist eliminator and industrial air scrubbing systems. Add this product at a point of uniform mixing.

DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add 34.6 to 103.7 fluid ounces of product per 1000 gallons (270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 10.3 to 51.8 fluid ounces of product per 1000 gallons (81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[HEAT TRANSFER SYSTEMS

When used as directed, this product effectively controls algal, bacterial, and fungal slimes in brewery pasteurizers, bottle and can warmers and hydrostatic sterilizers and retorts. Add this product at a point of uniform mixing.

DOSAGE RATES FOR ABOVE APPLICATIONS.

Initial Dose: When the system is noticeably fouled, add 34.6 to 103.7 fluid ounces of product per 1000 gallons (270 to 810 milliliters/1000 liters) of water contained in the system. Repeat until control is achieved.

Subsequent Dose: When microbial control is evident, add 10.3 to 51.8 fluid ounces of product per 1000 gallons (81 to 405 milliliters/1000 liters) of water contained in the system. Repeat as needed to maintain control.

Heavily fouled systems must be cleaned before treatment is begun.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[PULP, PAPER, AND PAPERBOARD MILLS:

THIS PRODUCT IS ONLY FOR USE IN NON-FOOD APPLICATION, such as Brown Paper Mills, Sheet for Corrugated Board, Kraft Paper, Newsprint and similar paper / paperboard not intended for food contact uses. When used as directed this product effectively controls bacterial and fungal slimes in pulp, paper, and paperboard mill process water systems including white water systems. Treat water at critical areas in the system where mixing of the product will be uniform such as beaters, furnish chest, white-water tank, save-all, and broke chest. The frequency and duration of the treatment will depend upon the severity of the problem.

DOSAGE RATES.

Initial Dose: When the system is noticeably fouled, add 2.7 to 16.2 pounds of this product per ton of pulp or paper (dry basis) as a slug dose. Repeat until control is achieved. Heavily fouled systems must be cleaned before initial treatment.

Subsequent Dose: When biological control is evident, add 1.6 to 10.8 pounds of product per ton of pulp or paper (dry basis) as a slug dose as necessary to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[ENHANCED OIL RECOVERY SYSTEMS:

NOT FOR USE IN ESTUARINE OR MARINE OIL RECOVERY SYSTEMS. When used as directed this product effectively controls slime-forming and sulfate-reducing bacteria in injection and produced water systems, water disposal systems, and other oilfield water systems. Treat water at critical points in the system such as water or oil storage tanks, surge tanks, oil-water separators, before or after injection pumps, and injection well headers.

DOSAGE RATES FOR ENHANCED OIL RECOVERY SYSTEMS.

When the system is noticeably fouled, or to maintain control in the system, add 4.2 to 340.2 gallons of this product per 1000 barrels of water as a slug dose for 1-8 hours per day, 1-4 times per week.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[OIL AND GAS PRODUCTION AND TRANSMISSION PIPELINES AND SYSTEMS:

This product must be added at a point in the pipeline where uniform mixing will occur. Conduct the application to ensure maximum distribution of product through the entire

internal surface of the pipeline. Follow dosing instructions for enhanced oil recovery systems.]

[GAS STORAGE WELLS AND SYSTEMS:

Individual injection wells must be treated with a sufficient quantity of product to produce a concentration of 100-8100 ppm of this product when diluted by the water present in the formation. Repeat injections as needed to maintain control.

Individual drips must be treated with sufficient quantity of this product to produce a concentration of 100-8100 ppm of this product when diluted by the water present in the drips. Repeat injections as needed to maintain control.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[HYDROTESTING:

Water used to hydrotest pipelines or vessels must contain 100-8100 ppm of product, depending on water quality and length of time the equipment will remain idle.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[PIPELINE PIGGING AND SCRAPING OPERATIONS

Add this product to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and a trailing pig). Add sufficient product to produce a concentration of 100-8100 ppm of this product in the water at the discharge point or pig trap depending on the length of the pipeline and the severity of biofouling.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

[DRILLING, PACKER, COMPLETION, WORKOVER AND FRACTURING FLUIDS:

This product must be added to these fluids at a point where uniform mixing will occur. Add 100-8100 ppm of this product to a freshly prepared fluid depending on the severity of contamination.]

[NOT REGISTERED FOR USE IN [CALIFORNIA], [NEW YORK], [FLORIDA]]

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Keep product dry and store in a cool dry well-ventilated area away from heat or open flame. Store in original container.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

{Text for non-refillable containers}

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. If not, puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Triple rinse container (or equivalent) promptly after emptying.

{For containers of 5 gallons or less} [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.]

{For containers with capacities of greater than 5 gallons} [Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.]

{Text for refillable containers}

CONTAINER DISPOSAL: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

NOTE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Manufactured for:
BWA Water Additives US LLC
1979 Lakeside Parkway, Suite 925
Tucker, GEORGIA 30084

EPA REG. # 83451-22
EPA EST. # [1448-TN-01]
[appropriate Est. No.]

NET WEIGHT: ## lbs (##kg)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 8, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

ROSS BEATTIE
BWA WATER ADDITIVES US LLC
1979 LAKESIDE PARKWAY, SUITE 925
TUCKER, GA 30084-

PRODUCT NAME: BELLACIDE 301
COMPANY NAME: BWA WATER ADDITIVES US LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83451-22
EPA RECEIPT DATE: 12/07/16

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 347-8028.

Sincerely,

A handwritten signature in black ink, appearing to be "S. [unclear]".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Fee for Service

{995949}~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr.

31

Receipt No.

S-

995949

EPA File Symbol/Reg. No.

83451-22

Pin-Punch Date:

11/7/2016



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: TEAM 4 / TIFFANY TRAN Date: Dec/7/2016

Remarks: 307 label amendment



BWA Water Additives US LLC
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084
USA

Tel 678 802 3050
Fax 678 802 3024

December 5, 2016

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Bellacide 301
EPA Registration No.: 83451-22

Sir/Madam:

Please process the enclosed amendment for the above referenced product. The purpose of this amendment is to expand the dose rates that are listed on the labeling (dated November 5, 2012) for EPA Reg. No. 83451-22 (Bellacide 301) for Enhanced Oil Recovery Systems.

Current dose rates for these End Uses recommend dose rates of 540-8100 ppm of product (27-405 ppm Active Ingredient).

In-house efficacy testing has shown that Bellacide 301 is efficacious in Enhanced Oil Recovery Systems down to 5ppm Active Ingredient. As such, BWA would like to amend current labeling to list the dose rates for these system as **100-8100 ppm of product**.

Please review the attached Bellacide 301 label that has incorporated these expanded dose rates.

Enclosed in this Amendment package please find:

1. Application for Pesticide (EPA Form 8570-1); and
2. Five (5) copies of proposed Bellacide 301 (EPA Re. No. 83451-22) labeling

If you have any questions, please call me at 678-802-3032.

Thank you for your attention to this matter.

Sincerely,

Ross Beattie
Registration Manager
BWA Water Additives
p)678-802-3032



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83451-22	2. EPA Product Manager Eric Miederhoff	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker GA, 30084 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Amendment) ross.beattie@wateradditives.com

This submission is to amend the dose rates included on the labeling for EPA Reg. No. 83451-22 (Bellacide 301). Additional 'in-house' testing has shown that Bellacide 301 is efficacious against common microbial pests in Enhanced Oil Recovery Systems down to 5 ppm Active Ingredient concentrations. BWA would like to adjust dosing levels on the current Bellacide 301 labeling accordingly. Please see cover letter for additional details.

Section - III**1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> on label
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____		

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name Ross Beattie	Title Regulatory Manager	Telephone No. (Include Area Code) 678-802-3032
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Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received
(Stamped)

2. Signature 	3. Title Regulatory Manager
4. Typed Name Ross Beattie	5. Date December 5, 2016



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Ross Beattie
Product Registration Manager
BWA Water Additives
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

FEB -4 2015

Subject: CSF Amendment – Alternate CSF 4 and 5
Product Name: Bellacide 301
EPA Registration Number: 83451-22
Application Date: 11/03/14
Decision Number: 424254

Dear Mr Beattie:

The Confidential Statement of Formulation (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is not acceptable for the following reasons:

1. The proposed alternate #4 and #5 represents a new product since it is not similar to the basic formulation and it should be registered as a new product.

Therefore, your application is not acceptable. No further processing of this application will occur. If you have any questions, please contact John Cowden by phone at 703-347-0259, or via email at Cowden.johnc@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble", is written over the typed name.

Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 29, 2015

Ross Beattie
Product Registration Manager
BWA Water Additives
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084

Subject: CSF Amendment – Alternate CSF 3
Product Name: Bellacide 301
EPA Registration Number: 83451-22
Application Date: 10/31/14
Decision Number: 497249

Dear Mr Beattie:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 07/25/2012
- Alternate CSF 1 dated 05/05/2014
- Alternate CSF 2 dated 06/04/2014
- Alternate CSF 3 dated 10/31/2014

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact John Cowden by phone at 703-347-0259, or via email at Cowden.johnc@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Velma Noble", with a long, sweeping flourish extending to the right.

Velma Noble

Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83451-22	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Bellacide 301	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) BWA Water Additives US LLC 1979 Lakeside Parkway, Suite 925 Tucker GA, 30084 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Fast Track Amendment) ross.beattie@wateradditives.com

BWA would like to create Alt CSF #3 for Bellacide 301 by a) removing the inert component (already approved in Alt CSF #2) and substituting a new source of one of the active ingredients with another registered source. Please see cover letter for additional details.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ross Beattie		Title Product Registration Manager	
		Telephone No. (Include Area Code) 678-802-3032	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Product Registration Manager	
4. Typed Name Ross Beattie		5. Date October 31, 2014	



BWA Water Additives
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084

Tel 678 802 3050
Fax 678 802 3024

October 31, 2014

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Bellacide 301 - EPA Registration No.: 83451-22
Removal of Unneeded Inert Component
Substitution of a Registered Biocide Component
Alternate Confidential Statement of Formula #3

Ms. Noble:

Please process the enclosed amendment for the above referenced product.

The current Bellacide 301 (EPA Reg. No. 83451-22) formulation contains the inert ingredient [REDACTED]. This inert component is required as a formulation stabilizing component for 'Bellacide 303' (EPA Reg. No. 83451-20), a concentrated version of the 5% Bellacide 301 product.

Recent studies have shown that Bellacide 301 remains stable in solution, without the stabilizer.

BWA would like submit an Alternate Confidential Statement of Formula #3 that does not include the inert component listed above (already reviewed and approved in Bellacide 301 Alternate Formulation #2).

BWA would also like to substitute the source of the **Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]** of an active ingredient in this product.

BWA would like to list **Bellacide 370** (EPA Reg. No. 83451-24) as the source of **Poly[oxyethylene(dimethyliminio)ethylene(dimethyliminio)ethylene dichloride]** in the Bellacide 301 product.



BWA Water Additives
1979 Lakeside Parkway
Suite 925
Tucker, GA 30084

Tel 678 802 3050
Fax 678 802 3024

Enclosed please find:

1. Application for Pesticide (EPA Form 8570-1);
2. Two (2) copies of the CSF, Alternate Formulation #3;

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross Beattie", with a long, sweeping horizontal line extending to the right.

Ross Beattie
Product Registration Manager
BWA Water Additives
p)678-802-3032
f)678-802-3024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Antimicrobials Division (AD)

January 29, 2015

EPA Reg#: 83451-22		DP Barcode: 423965	
		Submission #: 959942	
Product name: Bellacide 301		Registrant: BWA Water Additives US LLC	
Reviewer's name: Juan F. Negrón		AD/PSB/CTT- Product Chemistry Reviewer	
Agency due date: 02/01/15		PSB received date: 12/02/2014	
CTT received date: 12/03/2014		Science received date: 12/09/2014	
Formulation type: EUP		Pesticide classification:	
Integrated system: <input type="checkbox"/>	Non-integrated system: <input checked="" type="checkbox"/>	Food use: <input type="checkbox"/>	Non food use: <input checked="" type="checkbox"/>
Action Code: 362		Date Completed: 01/29/2015	
PC Code(s)	CAS #(s)	Active Ingredient Names	% w/ (label)
128824	81741-28-8	Tri-n-butyl tetradecyl phosphonium chloride	2.78
Molecule structure (optional):			
069183	31512-74-0	Poly(oxy-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)	2.22
Molecule structure (optional):			
Comments:			
Approver: Karen P. Hicks		Approved date:	

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Environmental Protection
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Office of Pesticide Programs

Antimicrobials Division (AD)

January 29, 2015

MEMORANDUM

Subject: Product Chemistry Review for EPA Reg # 83451-22
Product Name: Bellacide 301
DP Barcode: 423965

From: Juan F. Negrón, Chemist
Product Science Branch, CT Team
Antimicrobials Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobials Division (7510P)

To: Velma Noble / John C. Cowden
PM Team 31

APPLICANT: BWA Water Additives US LLC
Action code: 362
Due date: 02/01/15

Product Formulation

Active Ingredients from label:

% by wt.

Tri-n-butyl tetradecyl phosphonium chloride	2.78
Poly(oxy-1,2-ethanediyl(dimethylimino) -1,2-ethanediyl(dimethylimino)-1,2-ethanediyl dichloride)	2.22

BACKGROUND:

The registrant, BWA Water Additives US LLC, is submitting an application for a formulation amendment to add an alternate formulation for the end-use product, "Bellacide 301" as a non-integrated system. The product is classified as a fungicide, a bacteriocide, and a algicide. The Product Chemistry Reviewer has reviewed the following documents:

- Confidential Statements of Formula (CSF), dated 10/31/2014, for alternate # (3) formulation.
- A label, dated 11/05/2012.
- A letter, dated 10/31/2014.
- Application for pesticide amendment dated 10/31/2014.

FINDINGS:

1. The CSF, dated 10/31/2014, for alternate # (3) formulation is revised.
2. The CSF and the label have the same nominal concentration for the active ingredients (AIs).
3. All components meet the EPA Standard Certified Limits, except for the diluent.
4. The diluent shows a narrow certified limits.

CONCLUSIONS:

The CSF, dated 10/31/2014, for alternate # (3) formulation is acceptable. However, a minor correction must be made to update the diluent certified limits. See recommendations. The proposed amendment is acceptable.

RECOMMENDATIONS:

1. The registrant must change the upper certified limit from [REDACTED] and the lower certified limit from [REDACTED] for the diluent shown on the CSF dated 10/31/2014 as an alternate #3 formulation.